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DISTRICT COURT
CLARK COUNTY, NEVADA

C.M., individually and as parent to D.M.,
B.C., individually and as parent to C.C.,
L.C., individually and as parent to C.C.,
D.C., individually and as parent to R.C.,
C.S., individually and as parent to D.S.,
L.K., individually and as parent to M.K.

Case No.: 2:20-cv-01562-JCM-BNW

STIPULATION AND ORDER TO STAY
CASE

On behalf of themselves and all other similarly
situated,

Plaintiffs,

vs.

JESUS JARA, in his professional and personal
capacities, DUSTIN MANCL, in his professional
and personal capacities, and CLARK COUNTY
SCHOOL DISTRICT, STATE OF NEVADA
DEPARTMENT OF EDUCATION; and DOES 1
through 100; ROE ENTITIES 11 through 200,
inclusive,

Defendants.

Defendants JESUS JARA, DUSTIN MANCL, and the CLARK COUNTY SCHOOL
DISTRICT (collectively "CCSD Defendants"), and Plaintiffs C.M., B.C., L.C., D.C., C.S., AND
L.K., et seq., (collectively "Plaintiffs") by and through their respective counsel of record, hereby
stipulate to the following:

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1 1. On August 21, 2020, Plaintiffs filed a Class Action Complaint (ECF No. 1) against
2 CCSD Defendants. Thereafter, Plaintiffs filed a First Amended Class Action Complaint. (ECF No.
3 2).

4 2. On November 10, 2020, Plaintiffs filed an Emergency Ex-Parte Motion for TRO
5 and Preliminary Injunction. (ECF Nos. 6 & 8). Eventually, both the TRO and Preliminary
6 Injunction were denied. (ECF Nos. 5 and No. 19).

7 3. On February 19, 2021, CCSD Defendants filed a Motion to Dismiss, Motion to
8 Strike, and Motion to Stay pending a decision on the Motion to Dismiss. (ECF Nos. 22- 24).

9 4. On March 19, 2021, Plaintiffs' filed Oppositions to CCSD Defendants' Motion to
10 Dismiss and Motion to Strike, as well as a Countermotion for Leave to File a Second Amended
11 Complaint ("SAC") (ECF Nos. 32-35).

12 5. The Magistrate Judge granted CCSD Defendants' the Motion to Stay pending
13 resolution of the Motion to Dismiss. (ECF No. 31).

14 6. On September 16, 2021, the Magistrate Judge issued her Report and
15 Recommendation and Order ("Report and Recommendation") (ECF No. 44), which granted, in
16 part, Plaintiffs' Motion for Leave to Amend and granted, in part, CCSD Defendants' Motion to
17 Dismiss.

18 7. On September 30, 2021, CCSD Defendants filed an Objection to the Report and
19 Recommendations and a Motion for Stay Pending Objection. (ECF No. 49-50).

20 8. Plaintiffs have expressed a keen desire to proceed with discovery in this matter.

21 9. Despite this, the Parties agree that Plaintiffs will utilize the administrative process
22 in a good faith attempt to resolve the disputes subject to this Action.

23 10. Plaintiffs and CCSD Defendants hereby agree to a stay of this case, including all
24 dates and deadlines now pending—which includes Plaintiffs' deadline to submit a response to
25 CCSD Defendants' Objection to the Report and Recommendation)—until January 10, 2022
26 (approximately 90 days).

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11. The Parties agree that a stay of this case and all of its accompanying deadlines will provide the Parties a chance to explore settlement including through administrative proceedings in order to preserve costs, attorneys' fees, pro bono resources, and judicial resources.

12. The Parties seek a stay of approximately 90 days, taking into account the upcoming holidays and administrative calendaring constraints.

13. The Parties will file a Memorandum of Status with this Court on or before **January 10, 2022**, providing an update as to the status of the case and the Stay.

14. CCSD Defendants agree that if settlement efforts prove futile, Plaintiffs may lift the stay, respond to Defendants objection, and proceed with litigation in the ordinary course or as instructed by this Court.

15. In the event that settlement efforts prove futile and the stay is lifted, the Parties mutually agree to not unreasonably delay, postpone, or oppose discovery efforts and to cooperate in good faith.

16. This is the first stipulation to stay these proceedings, and this request is made in good faith and is not sought any improper purpose or for the purpose of delay.

IT IS SO STIPULATED.

Dated this 14th day of October, 2021.

Dated this 14th day of October, 2021.

MARQUIS AURBACH COFFING

DAVISON VAN CLEVE, PC

By: /s/ James A. Beckstrom

By: /s/ Ariel C. Johnson

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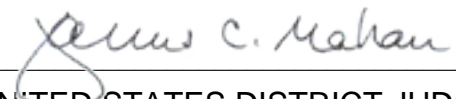
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ORDER

IT IS SO ORDERED that in accordance with the above stipulation:

1. This instant case is hereby **STAYED until JANUARY 10, 2022**; and
2. The Parties shall file a Joint Memorandum of Status with the Court on or before January 10, 2022.

DATED October 18, 2021.


UNITED STATES DISTRICT JUDGE

Submitted by:

MARQUIS AURBACH COFFING

By: /s/ James A. Beckstrom

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